

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) **INDICTMENT** **CR-10-62 DSD/JJK**
)
Plaintiff,) (18 U.S.C. § 371)
) (18 U.S.C. § 472)
v.) (18 U.S.C. § 981(a)(1)(C))
) (28 U.S.C. § 2461(c))
1. BENJAMIN GARDUWAR KARBEDEH,)
)
2. TIMOTHY SEWRO BOE, and)
)
3. SYLVESTER RICHARDS GAYEKPAR,)
)
Defendants.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Possess Altered Currency
with Intent to Defraud)

1. From on or about December 1, 2009, through February 18, 2010, in the State and District of Minnesota and elsewhere, the defendants,

BENJAMIN GARDUWAR KARBEDEH,
TIMOTHY SEWRO BOE, and
SYLVESTER RICHARDS GAYEKPAR

did knowingly and unlawfully conspire, with each other and with others known and unknown to the grand jury, to knowingly possess, pass and utter, with intent to defraud, an altered obligation and security of the United States, to wit: U.S. currency, all in violation of Title 18, United States Code, Section 472;

PURPOSE OF THE CONSPIRACY

2. It was the purpose of the conspiracy to enrich the co-conspirators by obtaining money by fraudulent means from individuals who were tricked by the scheme.

SCANNED

MAR 18 2010

U.S. DISTRICT COURT MPLS

FILED MAR 18 2010
RICHARD D. SLETTEN
JUDGMENT ENTD _____
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MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that from on or about December 1, 2009 through February 18, 2010 the defendants engaged in a variation of the scheme to defraud other persons that is sometimes referred to as the "black money scam".

4. This variation of the "Black money scam" is a scheme in which the victim was shown blackened paper cut to the size of U.S. currency. The defendants falsely represented to the victim that they could convert the blackened paper into U.S. currency. The defendants also falsely claimed that they could use reddish-brown liquid and physical pressure to pass the impression of genuine Federal Reserve Notes (FRN) to the blackened paper and then use a clear liquid to wash the blackened paper to reveal a new FRN.

5. During the time period of the conspiracy, the defendants attempted to obtain at least \$50,000 by this scheme.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and in order to effect the objects of the conspiracy, the defendants listed below and others committed overt acts, including the following:

6. On or about December 1, 2009, KARBEDEH, YOUSEPH IDRIS, and GAYEKPAR possessed items necessary to execute the black money scheme, including a suitcase containing black paper cut to the size of genuine U.S. currency and covered with a white, powdery

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substance, along with a bottle of reddish-brown liquid believed to be iodine.

7. On or about February 1, 2010, defendant BENJAMIN KARBEDEH approached a potential victim, Individual "A", exchanged telephone numbers, and gave Individual "A" a white envelope which contained a \$20 genuine Federal Reserve Note (FRN).

8. Later that day, defendant BENJAMIN KARBEDEH telephoned Individual "A" and described to him/her that he had a process in which he could double whatever money Individual "A" provided to him.

9. On or about February 3, 2010, defendants BENJAMIN KARBEDEH and TIMOTHY BOE met with Individual "A" and demonstrated the fraudulent process. Defendants Karbedeh and Boe demonstrated the fraudulent currency impression transfer process by removing a black substance from a genuine FRN and then purportedly passing the impression from the genuine FRN to black pieces of paper cut to the size of U.S. currency. Defendants KARBEDEH and BOE falsely told Individual "A" that they would double whatever money Individual "A" gave them.

10. On or about February 11, 2010, defendants BENJAMIN KARBEDEH and TIMOTHY BOE told Individual "A" to give them \$50,000 and a safe in order for them to double his/her money. KARBEDEH and

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BOE explained that they planned to put the genuine \$50,000 provided from Individual "A" in the safe along with the blackened paper that they had previously displayed. The safe would then be locked and KARBEDEH and BOE would keep the key to the safe and Individual "A" would keep the key to the hotel room where this meeting would take place. The next day KARBEDEH and BOE would return to the hotel room, meet Individual "A" and the three of them would conduct the transfer of impression as demonstrated earlier. When Individual "A" told defendants BENJAMIN KARBEDEH and TIMOTHY BOE that they would not be allowed to depart with the \$50,000 until Individual "A" received the money that defendants KARBEDEH and BOE promised, defendants KARBEDEH and BOE falsely represented that when Individual "A" brought them \$50,000, the defendants would convert these funds into an additional \$100,000. Defendants KARBEDEH and BOE told Individual "A" that Individual "A" could keep the original \$50,000 and half of the newly-washed \$100,000, and the defendants would keep the remaining newly-washed \$50,000.

11. On February 18, 2010, defendants BENJAMIN KARBEDEH and TIMOTHY BOE met with Individual "A" at the Comfort Inn Hotel, Bloomington, Minnesota. BENJAMIN KARBEDEH and TIMOTHY BOE once again demonstrated the fraudulent impression transfer procedure.

12. After departing, defendants BENJAMIN KARBEDEH, TIMOTHY BOE and SYLVESTER GAYEKPAR returned to the Comfort Inn Hotel in

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possession of a large black suitcase. The driver, SYLVESTER GAYEKPAR, remained in the vehicle, parked in the southwest area of the Comfort Inn parking lot.

13. Defendants BENJAMIN KARBEDEH and TIMOTHY BOE then returned to the room at the Comfort Inn Hotel and met with Individual "A" and continued their demonstration of the fraudulent impression transfer process.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

(Possession of Altered Currency with Intent to Defraud)

On or about February 3, 2010, in the State and District of Minnesota, the defendants,

**BENJAMIN GARDUWAR KARBEDEH and
TIMOTHY SEWRO BOE,**

did knowingly possess, pass and utter, with intent to defraud, an altered obligation and security of the United States, to wit: U.S. currency, all in violation of Title 18, United States Code, Section 472.

COUNT 3

(Possession of Altered Currency with Intent to Defraud)

On or about February 18, 2010, the defendants,

**BENJAMIN GARDUWAR KARBEDEH and
TIMOTHY SEWRO BOE,**

did knowingly possess, pass and utter, with intent to defraud, an altered obligation and security of the United States, to wit: U.S.

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currency, all in violation of Title 18, United States Code, Section 472.

FORFEITURE ALLEGATIONS

Counts 1-3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c).

As a result of the foregoing offenses, the defendants,

**BENJAMIN GARDUWAR KARBEDEH,
TIMOTHY SEWRO BOE, and
SYLVESTER RICHARDS GAYEKPAR,**

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violations alleged in Counts 1-3 of the Indictment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of all the defendants' right, title and interest in any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371 and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON